

# Exhibit 15.

CHRISTOPHER J. MERTENS

Email: cmertens@mmclegal.net

Miller, Mertens & Comfort, PLLC

1020 N. Center Parkway, Suite B

Kennewick, WA 99336

Telephone: (509) 374-4200

Fax: (509) 374-4229

Attorneys for Defendants Oasis

Physical Therapy, PLLC, Lance

Irvine and Mindi Irvine

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

AMERICAN CASUALTY CO. OF  
READING, PA,

Plaintiff,

vs.

OASIS PHYSICAL THERAPY, PLLC,  
MINDI IRVINE, LANCE IRVINE,  
RAFAT SHIRINZADEH and YVONNE  
SHIRINZADEH, KELLY COX,  
SUSAN TABER and ANGELA HART,

Defendants.

NO. CV-08-5077-LRS

DEFENDANT OASIS PHYSICAL  
THERAPY, PLLC, MINDI IRVINE,  
AND LANCE IRVINE'S ANSWER  
TO AMENDED COMPLAINT FOR  
DECLARATORY RELIEF,  
AFFIRMATIVE DEFENSES, AND  
COUNTERCLAIM

## XX.

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2 By way of answer to Paragraph 44 of the Amended Complaint, these  
3 defendants are without sufficient information to admit or deny, and therefore deny  
4 the same.  
5

## XXI.

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8 By way of answer to Paragraph 45 of the Amended Complaint, these  
9 defendants admit the same.  
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## XXII.

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12 By way of answer to Paragraph 46 of the Amended Complaint, these  
13 defendants admit that American Casualty declined to defend Lance Irvine and  
14 Yvonne Shirinzadeh, but deny that they do not qualify as insureds under the  
15 Policy.  
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## XXIII.

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19 By way of answer to Paragraph 47 of the Amended Complaint, these  
20 defendants deny the same.  
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24  
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- 1 4) For an award of damages herein, including actual damages, treble  
2 damages, attorneys fees, and actual and statutory litigation costs under  
3 RCW 48.30.015 and/or RCW 19.86.090;  
4  
5 5) For such other and further relief as the court deems just and equitable.

6 DATED this 9th day of April, 2009.

8 MILLER, MERTENS & COMFORT, PLLC

9  
10 By: /s/ Christopher J. Mertens  
11 CHRISTOPHER J. MERTENS  
12 WSBA #13591  
13 1020 N. Center Pkwy, Ste. B  
14 Kennewick, WA 99336  
15 (509) 374-4200 (phone)  
16 (509) 374-4229 (facsimile)  
17 cmertens@mmclegal.net  
18 Attorneys for Defendants Oasis Physical  
19 Therapy, PLLC, Mindi Irvine  
20 and Lance Irvine  
21  
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23  
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